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Puget Sound Clean Air Agency

Stack Test Evaluation

Puget Sound Clean Air Agency
Compliance Department

Reg #:	11656 - 527	Routed:	Engineer	GSP	Inspector	TJH	Supervisor	MAP	Planner	RGB
Date Received:	08/07/2009	Reviewed:		08/14/2009		09/01/2009		09/02/2009		09/03/2009

☑ Received Paper Copy

Facility: **Ardagh Glass**

Address: **5801 E Marginal Way S**
Seattle, WA 98134

Date Received: **08/07/2009**

Date Evaluated: **08/14/2009**

Test Date: **06/10/2009**

Test Results: ☑ **Passed** ☐ **Failed**

Date Observed:

Pollutant Tested: **7440-47-3 - Chromium and compounds**

Emission Unit Tested: **Glass Melting Furnace 3**

NOV / WW #:

Message on Information Request:

Review:

This is a stack test and Notification of Compliance Status report for furnaces 2 and 3. The stack test was performed to determine compliance with the MACT standard of 0.02 lb/ton of glass produced under Section 63.11451 of Subpart SSSSSS. Furnace 2 was tested on 6/10/09 and was found to be emitting 0.004 lb of chromium per ton of champagne green glass. Furnace 3 was tested on 6/9/09 and was found to be emitting 0.002 lb/ton of antique green glass. Chromium (iron chromite) is the only metal HAP added to the glass and it produces the green color. Champagne green contains about 6 times more iron chromite than antique green. It may be necessary to retest furnace 3 the next time it produces champagne green glass.

These tests had to be conducted while the furnaces were operating at their maximum production rate per 63.11452(b)(3). The pull rates during the test were 6.56 ton/hr for furnace 2 and 8.55 ton/hr for furnace 3. During the previous four tests, furnace 2 had pull rates of 7.14 ton/hr, 8.49 ton/hr, 8.74 ton/hr, 8.78 ton/hr (6/12/09, 2/25/09, 12/16/08, and 8/27/08). During the previous four tests, furnace 3 had pull rates of 8.55 ton/hr, 8.88 ton/hr, 8.94 ton/hr, 8.48 ton/hr. It doesn't appear that furnace 2 was operating at its maximum production rate during the chromium test. Further inquiry is warranted. The next quarterly test should be in September.

Although Method 29 enables simultaneous measurement of PM and metal emissions, the PM emissions weren't quantified. Therefore, I couldn't tell how representative these tests were in terms of particulate emissions.

The compliance date is 12/26/09 per 63.11450(a). The test had to be performed within 180 days of this compliance date per 63.11452(a). The test results were required to be submitted along with the Notification of Compliance Status within 60 days of the test per 63.11456(b)(1). Per 63.9(h), the reports had to be postmarked by 8/9/09 (furnace 3) and 8/10/09 (furnace 2). A hardcopy of these reports was received on 8/7/09. The MACT standard is not in the AOP yet so it's unclear if the reports have to be submitted electronically per Section 7.09(c) of Reg. I.

The Notification of Compliance Status must contain the information specified in 63.9(h). Since these furnaces have no control equipment, no monitoring is required under 63.11454 and continuous compliance can be demonstrated by satisfying the recordkeeping requirements under 63.11457, which appear to include only paragraphs (a)(1), (a)(4), (b), (c) and (d).

The standards don't apply during startup, shutdown and malfunction per 63.11455(a). However, the furnaces have to be operated in accordance with good air pollution control practices at all times per 63.11455(b) and 63.6(e)(1)(i).

I concur with Engineer Pade's findings on furnace No. 3. I issued WW 2-009314 for failure to test the furnace No. 2 at the maximum production rate on line No. 526.